

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNICARE AMBULANCE LLC,
PA PARAMEDICS LLC,
DAMON WADE, and
AMY WADE,

Defendants.

CIVIL ACTION NO. 19-cv-02943

UNITED STATES' CONSENT MOTION TO ENTER JUDGMENT

Plaintiff United States of America ("the government") requests that the Court enter consent Judgment. In support of this Joint Motion, the parties assert as follows:

1. This action was filed by the United States pursuant to the False Claims Act, 31 U.S.C. §§ 3729-3733.
2. As described more fully in the Complaint, defendants billed ambulance services to Medicare despite not being licensed to do so and made a series of material misrepresentations to state and federal authorities to conceal the true ownership and management of Unicare Ambulance LLC.
3. Defendants and the United States agreed to settle the claims in the Complaint pursuant to the covered conduct defined in the attached Settlement Agreement, and defendants consent to the entry of judgment in paragraph 1 of the Terms and Conditions of that Settlement Agreement.

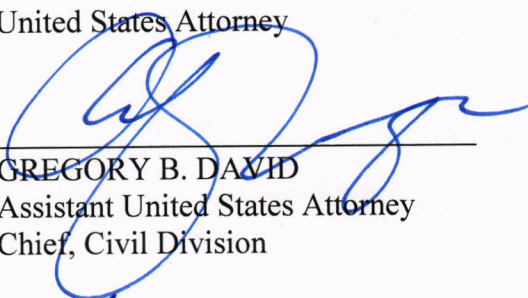
WHEREFORE, the United States respectfully requests that the Court:

1. Enter judgment by consent in the amount of \$459,907.42 in favor of the United States and against defendants Unicare Ambulance LLC, PA Paramedics LLC, Damon Wade, and Amy Wade, jointly and severally, as the final judgment in this case; and

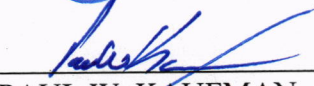
2. Once the judgment and is entered, mark this case be CLOSED for statistical purposes.

Respectfully submitted,

WILLIAM M. McSWAIN
United States Attorney



GREGORY B. DAVID
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Chief, Civil Division



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Counsel for Plaintiff United States of America

Dated: July 8, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion to Enter Judgment through their settlement counsel, Patrick Egan, Esquire, by electronic filing.

/s/ Paul W. Kaufman
PAUL W. KAUFMAN
Assistant United States Attorney